

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>In re:</b>	)	
	)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,	)	
	)	Chapter 11
Debtor.	)	
	)	
_____	)	
	)	
CDS BUSINESS SERVICES, INC. d/b/a	)	
NEWTEK BUSINESS CREDIT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Adv. Proc. No. 3:20-ap-90140
	)	
	)	
AMERICA CARES TRUST (ACT) d/b/a	)	
CARENATION	)	
	)	
Defendant.	)	

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**MOTION TO WITHDRAW  
AND TO STAY DEADLINE FOR RESPONSE TO  
MOTION TO FILE AMENDED AND SUPPLEMENTAL COMPLAINT**

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Pursuant to local rule LBR 2091-1, undersigned counsel hereby moves to withdraw as counsel for America Cares Trust (ACT) d/b/a CareNation.

Undersigned respectfully requests that Defendant have thirty (30) days to find new counsel and to answer Plaintiff CDS Business Services, Inc. d/b/a Newtek Business Credit's Motion to File an Amended and Supplemental Complaint (Doc. No. 76), which was filed on August 17, 2021.

Respectfully submitted,

By: /s/ William J. Haynes III  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following via ECF, this the 20th day of August, 2021.

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/s/ William J. Haynes III